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December 20, 2010

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear FCC:

My name is Daniel Roberts from 2781 Consortium. We are a coalition of community media activists, helping to create volunteer-based community radio stations with cultural institutions in local communities. For the last decade we have been waiting for the opportunity to apply for our own community radio station. Back in 2000 the FCC introduced a new service called LPFM for nonprofits like ours to start stations to serve underrepresented audiences. To this day there are no LPFM stations in the Bay Area. As for the number of translators in the Bay Area, we counted 24:

K201BV	BENICIA-MARTINEZ CA
K205BM	SAN RAFAEL, ETC. CA
K205BN	LOS GATOS CA
K207EP	CONCORD CA
K208DO	NAPA CA
K208CT	LIVERMORE CA
K210EH	BOLINAS CA
K211EZ	LIVERMORE CA
K212AA	LOS GATOS CA
K212BJ	DUBLIN CA
K214CS	SONOMA CA
K215CQ	SANTA ROSA CA
K216FV	CONCORD CA
K220JV	BYRON CA
K221DQ	PETALUMA CA
K249DJ	SAN PABLO CA
K257BE	LOS GATOS, ETC. CA
K264AQ	MOUNTAIN VIEW CA
K265CV	FREMONT CA
K265DI	SAUSALITO CA
K269FB	DALY CITY CA
K276DT	SANTA ROSA CA
K281BL	COYOTE CA
K289AS	COTATI CA

According to Common Frequency's second letter/report just submitted to the FCC, if the FCC follows through with their ten cap translator processing plan, six more translators could be licensed in San Francisco. This could include translators approved by entities like Your Christian Companion network (two possible), Educational Media Foundation, and Broadcast Towers Inc (three possible). The first two are networks that own stations in several states and already own translators in the Bay Area, and the third is a commercial entity that has been previously granted translators that were in-turn sold after granting for profit (such as their granted translators K277BN, K268BH, K289AS, W248AU, K298AZ, K298AW).

According to the study, there may be two channels left in the San Francisco area for LPFM after a simulated ten cap. It appears to us that this "ten cap" does not do that much for promoting localism or LPFM. We do not understand why the FCC would allow satellite-relayed networks and speculators to be granted prime San Francisco channels to be used for huge religious networks and trafficking purposes, while leaving the possibility of two *marginal* channels for the dozens of Bay Area nonprofits to fight over in a tentative LPFM filing window. This does not align with the Commission's view on upholding broadcast localism, diversity of ownership, or fair distribution of broadcast services.

We would like to request that the FCC give first priority for LPFM instead of allowing translator applicants, some of which already own translators in the Bay Area, the first choice of licensing channels in the Bay Area. Since there are already about 24 translators and zero LPFM channels currently licensed in the Bay Area, it is clear that the FCC's first priority should be to allow an LPFM application window to open before processing the rest of the rest of the pending translators.

Sincerely,

Daniel Roberts  
Chair  
2781 Consortium

Cc: Rosemary Harold  
Joshua Cinelli  
Dave Grimaldi  
Krista Witanowski  
Sherrese Smith  
Peter Doyle